

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MICROSOFT CORPORATION, a Washington
corporation,

Plaintiff,

v.

MOTOROLA, INC., and MOTOROLA
MOBILITY, INC., and GENERAL
INSTRUMENT CORPORATION,

Defendants.

MOTOROLA MOBILITY, INC., and
GENERAL INSTRUMENT CORPORATION,

Plaintiffs/Counterclaim Defendant,

v.

MICROSOFT CORPORATION,

Defendant/Counterclaim Plaintiff.

CASE NO. C10-1823-JLR

MOTOROLA'S RESPONSE TO
MICROSOFT'S MOTION FOR LEAVE
TO FILE MOTION TO AMEND
PROTECTIVE ORDER

**NOTED ON MOTION CALENDAR:
Friday, September 7, 2012**

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LEAVE TO FILE MOTION TO AMEND PROTECTIVE
ORDER
CASE NO. C10-1823-JLR

4835-9112-5776.3

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Microsoft's motion seeks leave to file a motion to amend the stipulated Protective Order that has governed discovery in this case for over a year. Motorola, Microsoft and third parties have produced hundreds of thousands of pages in reliance on the provisions and protections set forth in the Protective Order, including prohibiting disclosure of certain sensitive and highly confidential financial and licensing information to in-house counsel. Microsoft now asks the Court to amend the Protective Order so that Microsoft's in-house attorney can see information that the parties agreed he was prohibited from seeing at the time the information was produced by Motorola and by third parties. Microsoft's motion for leave to file motion to amend should be denied because it is untimely, and for the reasons set forth in Motorola's Response to Motion Amend attached hereto as Exhibit 1.

DATED this 5th day of September, 2012.

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***Attorneys for Motorola Solutions, Inc., Motorola
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CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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DATED this 5th day of September, 2012.

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